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Attorney for JOHN RODGERS, Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

JOHN RODGERS)	Case No. 3:14-cv-03854-LB
Plaintiff,)	<i>Civil Rights</i>
vs.)	PLAINTIFF'S REQUEST AND
KEVIN S. YOO, an individual, and DOES)	[PROPOSED] ORDER OF
1-10 inclusive,)	DISMISSAL WITH PREJUDICE
Defendants.)	
)	
)	

Pursuant to Fed. R. Civ. P. 41(a)(2) Plaintiff John Rodgers ("Plaintiff") hereby requests that the Court dismiss Plaintiff's Complaint against Defendant Kevin S. Yoo ("Defendant") with prejudice.

The parties attended a court sponsored mediation on August 14, 2015 and settled the matter in its entirety. Subsequently, Plaintiff and Defendant entered into a formal settlement agreement. Plaintiff provided Defendant with a draft stipulation and proposed order of dismissal of Plaintiff's complaint with prejudice. Plaintiff received no response from Defendant's counsel and has therefore been unable to obtain a signed stipulation from Defendant. In order to comply with the November 5th, 2015 deadline (Docket No. 20), Plaintiff respectfully requests that the Court dismiss Plaintiff's complaint with prejudice.

Dated: November 5, 2015

/s/ Irene Karbelashvili

By: Irene Karbelashvili
Attorney for Plaintiff
JOHN RODGERS

1 [PROPOSED] ORDER
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3 IT IS HEREBY ORDERED that:
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- 5 1. Plaintiff's Complaint in the above-entitled action shall be dismissed with
6 prejudice as against Defendant KEVIN S. YOO.
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2. The Court is to retain jurisdiction to enforce the terms of the parties'
8 SETTLEMENT AGREEMENT AND RELEASE OF ALL CLAIMS.
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3. Each Party shall bear its own costs and fees in this action.

10 Dated: November 6, 2015



11 _____
12 Honorable Laurel Beeler, United States
13 Magistrate Judge
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